

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE:**      **JOEL C. GROSHONG**  
**Debtor**

**CHAPTER 11**  
**CASE NO. 11-02179-KMS**

**MOTION TO APPROVE FINAL ACCOUNTING**

COMES NOW Joel C. Groshong (the “Debtor”), and files this his Motion to Approve Final Accounting (the “Motion”), and in support thereof, would respectfully show unto this Honorable Court as follows, to-wit:

1.     On June 20, 2011, the Debtor herein filed with this Court his original petition for reorganization under Chapter 11 of the Bankruptcy Code.
2.     This Honorable Court has jurisdiction of the subject matter herein and the parties hereto. This is a core proceeding.
3.     On July 29, 2013, the Court entered its Order Confirming Fourth Amended Plan of Reorganization (the “Confirmation Order”) [DK#591] confirming the Debtor’s Fourth Amended Plan of Reorganization (the “Plan”).
4.     During the course of this Chapter 11 case, the Debtor incurred \$241,370.33 in total fees and expenses to the Law Offices of Craig M. Geno, PLLC, plus some other fees as the Court may allow (less write offs) as professional fees and expenses to counsel for the Debtor, and has paid a total of \$235,355.46.
5.     In addition, the Debtor incurred \$4000.00 in total fees and expenses to his accountants, Martin D. Hunter, CPA, PC.
6.     The Debtor did not pay any compensation to any other professionals, nor has he paid, any unsecured creditor claims to date.
7.     The Debtor paid his normal, common and appropriate operating costs, expenses and other administrative expense claims in the ordinary course of his business. The amount of

fees and expenses necessary to set forth all of the payments made to administrative expense claimants, the dates thereof, the amounts thereof and other information is prohibitive. Accordingly, the Debtor incorporates, by reference, all of his prior Monthly Operating Reports, all of which indicate and reflect all of the payments made to administrative expense claimants during the administrative phase of this Chapter 11 case.

8. The Debtor has made, and distributed, to taxing authorities the sums called for in prior orders of the Court. No other priority claims were paid during the administrative phase in this case and the distributions are detailed on the Chapter 11 Final Report and Accounting attached hereto as Exhibit "A" and incorporated herein by reference.

9. The Debtor is current in connection with payments to his secured creditors.

WHEREFORE, PREMISES CONSIDERED, the Debtor respectfully prays that upon a hearing hereof, this Honorable Court will enter its Order approving this final accounting. The Debtor prays for general relief.

This, the 16<sup>th</sup> day of October, 2019.

Respectfully submitted,

JOEL C. GROSHONG

By His Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By:   
\_\_\_\_\_  
Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793  
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**CERTIFICATE OF SERVICE**

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via Notice of Electronic Filing, a true and correct copy of the above and foregoing instrument to:

Christopher J. Steiskal, Esq.  
Office of the United States Trustee  
[christopher.j.steiskal@usdoj.gov](mailto:christopher.j.steiskal@usdoj.gov)

This, the 10<sup>th</sup> day of October, 2019.

  
\_\_\_\_\_  
Craig M. Geno

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: JOEL C. GROSHONG**  
**DEBTOR(S) IN POSSESSION**

**CASE NO: 11-02179-KMS**  
**CHAPTER 11**

Report period: (date of filing) 6/20/2011 to (date of report) 7/29/2013

**CHAPTER 11 FINAL REPORT AND ACCOUNTING**

ADMINISTRATIVE EXPENSES PAID

1	Trustee's Compensation (Fees and Expenses)	<hr/>
2	Accountant's Fees and Expenses	<hr/>
3	Auctioneer's Fees and Expenses	<hr/>
4	Appraiser's Fees and Expenses	<hr/>
5	Attorney Fees and Expenses for Creditors' Committee	<hr/>
6	Attorney Fees and Expenses for Trustee	<hr/>
7	Attorney Fees and Expenses for Debtor	\$ 14,804.65
8	Other Attorney Fees and Expenses	<hr/>
9	Fees paid to U.S. Trustee	\$ 4,875.00
10	Other Administrative Fees and Expenses	<hr/>
11	<b>TOTAL (Lines 1 - 10)</b>	<b>\$ 19,679.65</b>

PAYMENTS TO CREDITORS

12	Distributions to Secured Creditors	\$ 424,230.78
13	Distributions to Priority Creditors	<hr/>
14	Distributions to Unsecured Creditors	<hr/>
15	Distributions to Equity Security Holders	<hr/>
16	Other Distributions to Creditors	<hr/>
17	<b>TOTAL (Lines 12 - 16)</b>	<b>\$ 424,230.78</b>
18	<b>TOTAL DISTRIBUTIONS *</b> (Lines 11 and 17)	<b>\$ 443,910.43</b>

\* Total Distributions should represent all monies paid for administrative expenses and all payments pursuant to the plan of reorganization or liquidation.

I declare under penalty of perjury that this chapter 11 case has been fully administered and that the information provided in this Chapter 11 Final Report and Accounting is true and correct, and that I have been authorized to file this document on behalf of the debtor.

  
Signature of Authorized Individual



  
Date